

licensed SMR facilities in the 200 channel block.^{33/} For example, in the panhandle of Florida, the Nextel group holds 58% of the total licensed SMR facilities.^{34/} In the state of Mississippi, this group holds 62% of the systems licensed on the 200 channels within the state.^{35/} Similarly, in Alabama, this group holds 80% of the total licensed SMR facilities within the state.^{36/} In Georgia, the group is licensed for 81% of the systems in the 200 channel block.^{37/} A bar graph prepared by Southern depicts the total number of SMR frequencies licensed in the state of Georgia compared to the number of frequencies licensed to the Nextel Group.^{38/} As the graph illustrates, the Nextel Group has substantial SMR license holdings in the state of Georgia, in some instances holding all of the SMR licenses for a particular channel. Likewise, the bar graphs for Alabama, Florida and Mississippi also illustrate

^{33/} For the purposes of these studies, Nextel, the dominant SMR entity, includes spectrum holdings of Motorola, Dial Page, Transit, Johnson Communications, Inc., Advanced Mobile of North Carolina, AMK, Dial Call, SLLCC and Smart SMR, all of whom have sold or are in the process of merging their SMR holdings into Nextel.

^{34/} See, Exhibit I attached.

^{35/} See, Exhibit J attached.

^{36/} See, Exhibit K attached.

^{37/} See, Exhibit L attached.

^{38/} See, Exhibit M attached.

considerable SMR license holdings when compared to the total number of SMR licenses issued.^{39/}

27. Obviously, Nextel is uniquely and solely positioned to benefit from the proposed MTA/SMR auctions. It has a commanding and controlling interest in the vast majority of the 200 channel block, and a successful auction bid will only solidify its SMR dominance and eliminate the competition. Of equal importance, is that the 800 MHz SMR facilities not licensed by the Nextel group in the above-referenced areas are licensed to small SMR operators holding few channels. Therefore, the picture that emerges shows not only that Nextel is the majority holder of the 200 channels in these areas, but that its minority competition is comprised not of another large license holder, but of several small SMR entrepreneurs with, in most cases, single channel sites. While Southern has not had the opportunity to review the licensing picture throughout the entire United States, it believes a similar pattern would emerge.

^{39/} See, Exhibits N, O and P attached, illustrating SMR channel usage in Alabama, Florida and Mississippi, respectively.

V. Other Procedural and Technical Issues Regarding the Proposed Application Procedures

28. Regarding the proposed application procedures for MTA licensees, Southern adopts by reference its Comments and Reply Comments filed in GEN Docket 93-252 for the Commission's consideration.^{40/} Southern believes it is redundant to adopt the application procedures proposed in this FNPRM for SMR licensees who must adhere to the same new CMRS procedures, commencing January 2, 1995 for non-grandfathered CMRS providers and August 10, 1996 for grandfathered CMRS providers. Southern does not see the need to duplicate FCC efforts in this regard.

29. One proposal not set forth in this proceeding is the need to designate control channels for wide-area SMR systems to facilitate user roaming. Southern first espoused this proposal in the CC Docket 94-54 proceeding concerning equal access and interconnection obligations for CMRS providers.^{41/} Because that proceeding examines the

^{40/} See Southern Comments in GEN Docket 93-252 at 11-14 and Reply Comments at 10-14.

^{41/} In the Matter of Equal Access and Interconnection Obligations Pertaining to Commercial Mobile Radio Services, CC Docket 94-54, Notice of Proposed Rule Making and Notice of Inquiry, adopted June 9, 1994. See also, Southern Comments at 5-7, CC Docket 94-54, which are adopted herein by reference.

feasibility of mandating CMRS-to-CMRS interconnection obligations, Southern believed it was ripe to address roaming issues as part of the interconnection obligation. Southern believes that the public will benefit from user-friendly roaming arrangements. In the cellular arena, the Commission addressed this issue by designating standard control channels for all cellular systems. Southern believes that it is essential for the Commission to facilitate SMR roaming arrangements both from a policy standpoint by promulgating a rule governing roaming agreements, and from a technical standpoint through allocation of SMR control channels. Southern seeks adoption of the latter technical proposal in this FNPRM.

30. Designating spectrum for SMR control channels is in the public interest. The greatest benefit to the public for designating SMR control channels is to allow the subscriber to "roam" from one SMR service area to another with the same handset and without disruption or delay in obtaining service, regardless of which entity is the service provider. Without such a designation, SMR subscribers will be precluded from roaming on a state-wide, regional or nationwide basis, an unattractive impediment to the SMR service and one which hampers its competition with other mobile services. The free flow of subscribers throughout

various SMR networks is in the public interest since it benefits users of the services as well as competing providers.

Conclusion

31. Imposing a geographically-defined licensing scheme for either wide-area or local SMR systems is anticompetitive in result and unachievable in light of the current state of SMR spectrum availability. Southern urges the Commission to discontinue this proceeding in light of the views and statistical studies presented herein. However, should the Commission decide to proceed with this FNPRM, Southern requests that (1) a 140-channel SMR spectrum cap be adopted; (2) MTA applicants be limited to bidding on no more than two 50-channel blocks within an MTA; and (3) specific SMR channels be designated as control channels to facilitate subscriber roaming.

WHEREFORE THE PREMISES CONSIDERED, The Southern Company respectfully requests that the Commission act upon its

Further Notice of Proposed Rule Making in a manner
consistent with the views expressed herein.

Respectfully submitted,

THE SOUTHERN COMPANY

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Dated: January 5, 1995

EXHIBIT A

**800 MHZ SMR
SPECTRUM AVAILABILITY REPORT
(55 — MILE SEARCH)**

PREPARED BY

**INDUSTRIAL TELECOMMUNICATIONS ASSOCIATION
AMERICAN MOBILE TELECOMMUNICATIONS ASSOCIATION**

OCTOBER 11, 1994

POPULATION	BTA#	CITY NAME	REGION	SMR	FREQS	GRANTED	PENDING	AVAILABLE
18232800	321	New York, NY		200	200	0	0	
15415600	262	Los Angeles, CA		200	200	0	0	
8376000	078	Chicago, IL		200	200	0	0	
6700100	404	San Francisco-Oakland-San Jose, CA		200	200	0	0	
6001600	346	Philadelphia, PA-Wilmington, DE-Trenton, NJ		200	200	0	0	
4754100	112	Detroit, MI	C3	140	140	0	0	
4609300	101	Dallas-Fort Worth, TX		200	200	0	0	
4298500	461	Washington, DC		200	200	0	0	
4241400	196	Houston, TX		200	200	0	0	
4140500	051	Boston, MA		200	200	0	0	
3449200	024	Atlanta, GA		200	200	0	0	
3399700	293	Miami-Fort Lauderdale, FL		200	200	0	0	
2968900	298	Minneapolis-St. Paul, MN		200	200	0	0	
2927200	084	Cleveland-Akron, OH	C3	140	140	0	0	
2852900	413	Seattle-Tacoma, WA	C5	95	95	0	0	
2792900	394	St. Louis, MO		200	200	0	0	
2651400	402	San Diego, CA	MX	95	95	0	0	
2564500	347	Phoenix, AZ		200	200	0	0	
2494600	350	Pittsburgh, PA		200	200	0	0	
2492100	029	Baltimore, MD		200	200	0	0	
2355500	440	Tampa-St. Petersburg-Clearwater, FL		200	200	0	0	
2189500	110	Denver, CO		200	200	0	0	
2043500	081	Cincinnati, OH		200	200	0	0	
1899300	226	Kansas City, MO		200	200	0	0	
1803300	389	Sacramento, CA		200	195	0	5	
1786500	358	Portland, OR		200	200	0	0	
1784000	297	Milwaukee, WI		200	200	0	0	
1746200	074	Charlotte-Gastonia, NC		200	200	0	0	
1709600	324	Norfolk-Virginia Beach-Newport News-Hampton, VA		200	200	0	0	
1618000	401	San Antonio, TX		200	200	0	0	
1537700	095	Columbus, OH		200	194	0	6	
1522900	364	Providence-Pawtucket, RI-New Bedford-Fall Riv., MA		200	195	0	5	
1489300	314	Nashville, TN		200	193	0	7	
1426900	290	Memphis, TN		200	200	0	0	
1389700	320	New Orleans, LA		200	200	0	0	
1384400	263	Louisville, KY		200	200	0	0	
1373700	399	Salt Lake City-Ogden, UT		200	200	0	0	
1369800	204	Indianapolis, IN		200	200	0	0	
1365100	336	Orlando, FL		200	200	0	0	
1325100	329	Oklahoma City, OK		200	200	0	0	
1276600	174	Greensboro-Winston-Salem-High Point, NC		200	198	0	2	
1233600	106	Dayton-Springfield, OH		200	200	0	0	
1229000	060	Buffalo-Niagara Falls, NY	C2	60	60	0	0	
1227600	044	Birmingham, AL		200	200	0	0	
1185000	212	Jacksonville, FL		200	176	0	24	
1155300	368	Raleigh-Durham, NC		200	200	0	0	
1125900	374	Richmond-Petersburg, VA		200	200	0	0	
1123300	184	Hartford, CT		200	195	0	5	
1046300	007	Albany-Schenectady, NY		200	200	0	0	
987700	245	Las Vegas, NV		200	200	0	0	

POPULATION	BTA#	CITY NAME	REGION	SMR FREQS	GRANTED	PENDING	AVAILABLE
979700	469	West Palm Beach-Boca Raton, FL		200	200	0	0
979200	318	New Haven-Waterbury-Meriden, CT		200	200	0	0
971800	232	Knoxville, TN		200	200	0	0
964400	027	Austin, TX		200	200	0	0
955100	169	Grand Rapids, MI		200	200	0	0
925600	332	Omaha, NE		200	188	0	12
875500	257	Little Rock, AR		200	200	0	0
868800	192	Honolulu, HI		200	185	0	15
863000	448	Tulsa, OK		200	177	8	15
843200	252	Lexington, KY		200	191	0	9
832500	157	Fresno, CA		200	172	0	28
811700	177	Greenville-Spartanburg, SC		200	198	0	2
797400	438	Syracuse, NY	C2	60	46	0	14
793700	444	Toledo, OH	C3	140	140	0	0
747500	111	Des Moines, IA		200	185	0	15
734500	008	Albuquerque, NM		200	200	0	0
720200	480	Worcester-Fitchburg-Leominster, MA		200	200	0	0
707100	010	Allentown-Bethlehem-Easton, PA		200	195	0	5
706300	447	Tucson, AZ	MX	95	95	0	0
691700	128	El Paso, TX	MX	95	95	0	0
682000	412	Scranton--Wilkes-Barre--Hazleton, PA		200	200	0	0
677300	427	Springfield-Holyoke, MA		200	195	0	5
671000	181	Harrisburg, PA		200	194	0	6
664800	155	Fort Wayne, IN		200	200	0	0
657000	229	Kingsport, TN-Johnson City, TN-Bristol, VA-TN		200	192	0	8
653900	072	Charleston, SC		200	200	0	0
653500	410	Savannah, GA		200	193	0	7
641800	425	Spokane, WA		200	200	0	0
640000	032	Baton Rouge, LA		200	190	0	10
626800	210	Jackson, MS		200	185	0	15
622400	390	Saginaw-Bay City, MI	C7	190	150	3	37
615400	376	Roanoke, VA		200	200	0	0
614700	472	Wichita, KS		200	200	0	0
611200	302	Mobile, AL		200	195	0	5
611100	272	Madison, WI		200	198	0	2
605600	028	Bakersfield, CA		200	187	0	13
603600	271	Macon-Warner Robins, GA		200	196	0	4
589300	141	Fayetteville-Lumberton, NC		200	196	0	4
586900	419	Shreveport, LA		200	147	1	52
585300	091	Columbia, SC		200	199	0	1
568000	274	Manchester-Nashua-Concord, NH		200	200	0	0
554600	428	Springfield, MO		200	139	0	61
548400	434	Stockton, CA		200	195	0	5
542100	408	Sarasota-Bradenton, FL		200	199	0	1
537000	026	Augusta, GA		200	200	0	0
524300	151	Fort Myers, FL		200	195	0	5
523800	020	Asheville-Hendersonville, NC		200	193	0	7
521600	076	Chattanooga, TN		200	200	0	0
520700	065	Canton-New Philadelphia, OH	C7	190	177	3	10
509100	099	Corpus Christi, TX		200	192	0	8

POPULATION	BTA#	CITY NAME	REGION	SMR	FREQS	GRANTED	PENDING	AVAILABLE
508300	135	Evansville, IN		200	200	0	0	
504700	236	Lafayette-New Iberia, LA		200	182	0	18	
499900	145	Flint, MI	C3	140	134	0	1	
499400	241	Lansing, MI	C7	190	148	1	41	
492700	484	Youngstown-Warren, OH	C7	190	179	4	7	
484000	073	Charleston, WV		200	200	0	0	
478100	357	Portland-Brunswick, ME		200	200	0	0	
468900	372	Reno, NV		200	200	0	0	
463600	198	Huntsville, AL		200	186	0	14	
462500	268	McAllen, TX	MX	95	0	0	95	
461700	395	Salem-Albany-Corvallis, OR		200	200	0	0	
459300	303	Modesto, CA		200	192	0	8	
456200	344	Peoria, IL		200	171	0	29	
452500	305	Montgomery, AL		200	200	0	0	
447200	089	Colorado Springs, CO		200	176	20	4	
446500	458	Visalia-Porterville-Hanford, CA		200	135	0	65	
443500	050	Boise-Nampa, ID		200	200	0	0	
442900	240	Lancaster, PA		200	94	0	106	
436800	439	Tallahassee, FL		200	182	0	18	
434200	034	Beaumont-Port Arthur, TX		200	190	0	10	
433400	361	Poughkeepsie-Kingston, NY		200	194	0	6	
433100	483	York-Hanover, PA		200	200	0	0	
430700	289	Melbourne-Titusville, FL		200	199	0	1	
429000	107	Daytona Beach, FL		200	195	1	4	
424800	239	Lakeland-Winter Haven, FL		200	200	0	0	
423700	014	Anchorage, AK		200	200	0	0	
421200	380	Rockford, IL		200	192	0	8	
420700	105	Davenport, IA-Moline, IL		200	160	0	40	
412500	018	Appleton-Oshkosh, WI		200	191	0	9	
399000	119	Duluth, MN	C9	200	111	0	89	
395100	264	Lubbock, TX		200	189	0	11	
384300	406	Santa Barbara-Santa Maria, CA		200	200	0	0	
380300	013	Amarillo, TX		200	200	0	0	
379300	063	Burlington, VT	C2	60	43	3	14	
372600	397	Salinas-Monterey, CA		200	192	0	8	
370200	152	Port Pierce-Vero Beach-Stuart, FL		200	200	0	0	
366900	197	Huntington, WV-Ashland, KY		200	88	0	112	
360300	343	Pensacola, FL		200	200	0	0	
359400	319	New London-Norwich, CT		200	200	0	0	
359200	223	Kalamazoo, MI		200	192	0	8	
358500	043	Binghamton, NY		200	116	0	84	
352800	092	Columbus, GA		200	198	0	2	
349500	042	Biloxi-Gulfport-Pascagoula, MS		200	196	0	4	
346400	370	Reading, PA		200	200	0	0	
337900	179	Hagerstown, MD-Chambersburg, PA-Martinsburg, WV		200	174	0	26	
337800	424	South Bend-Nishawaka, IN		200	188	0	12	
331800	421	Sioux City, IA		200	162	0	38	
328600	025	Atlantic City, NJ		200	199	0	1	
325100	304	Monroe, LA		200	113	0	87	
324500	006	Albany-Tifton, GA		200	186	0	14	

POPULATION	STA#	CITY NAME	REGION	SMR	FREQS	GRANTED	PENDING	AVAILABLE
319600	173	Green Bay, WI		200	112	0	88	
318600	030	Bangor, ME	C7	190	70	1	119	
317300	256	Lincoln, NE		200	190	0	10	
316600	127	Elmira-Corning-Hornell, NY		200	54	13	133	
315600	453	Utica-Rome, NY	C9	200	93	0	107	
312500	016	Anderson, SC		200	200	0	0	
306400	463	Watertown, NY	C2	60	30	0	30	
301000	234	La Crosse, WI-Winona, MN		200	197	0	3	
300000	138	Fargo, ND		200	175	0	25	
299900	189	Hickory-Lenoir-Morganton, NC		200	191	0	9	
297600	260	Longview-Marshall, TX		200	160	5	35	
297000	449	Tupelo-Corinth, MS		200	182	0	18	
294000	441	Temple-Killeen, TX		200	147	0	53	
293300	153	Fort Smith, AR		200	124	0	76	
292700	041	Billings, MT		200	200	0	0	
292400	133	Eugene-Springfield, OR		200	187	0	13	
289400	056	Brownsville-Harlingen, TX		200	52	0	148	
287000	009	Alexandria, LA		200	142	0	58	
284700	365	Provo-Orem, UT		200	200	0	0	
277800	452	Tyler, TX		200	162	0	38	
277300	131	Erie, PA	C2	60	59	0	1	
274900	459	Waco, TX		200	196	0	4	
273400	371	Redding, CA		200	39	0	161	
272600	159	Gainesville, FL		200	192	0	8	
271700	366	Pueblo, CO		200	200	0	0	
267000	070	Cedar Rapids, IA		200	170	0	30	
265800	238	Lake Charles, LA		200	170	0	30	
265500	195	Houma-Thibodaux, LA		200	199	0	1	
263300	116	Dover, DE		200	195	5	0	
263000	478	Wilmington, NC		200	200	0	0	
259800	462	Waterloo-Cedar Falls, IA		200	182	0	18	
259200	426	Springfield, IL		200	126	0	74	
258600	443	Texarkana, TX-AR		200	88	0	112	
258200	211	Jackson, TN		200	183	0	17	
253800	235	Lafayette, IN		200	183	0	17	
253600	255	Lima, OH	C9	200	158	0	42	
252600	391	St. Cloud, MN		200	174	0	26	
249500	445	Topeka, KS		200	181	19	0	
249000	003	Abilene, TX		200	200	0	0	
247200	109	Decatur-Effingham, IL		200	167	0	33	
245100	147	Florence, SC		200	165	0	35	
244200	450	Tuscaloosa, AL		200	195	0	5	
243800	277	Mankato-Fairmont, MN		200	173	0	27	
241500	126	Elkhart, IN		200	167	0	33	
239100	330	Olean, NY-Bradford, PA	C2	60	10	23	27	
238600	218	Johnstown, PA		200	129	15	56	
237900	140	Fayetteville-Springdale-Rogers, AR		200	122	0	78	
237300	442	Terre Haute, IN		200	83	0	117	
237100	378	Rochester-Austin-Albert Lea, MN		200	192	0	8	
232200	033	Battle Creek, MI		200	195	0	5	

POPULATION	BTA#	CITY NAME	REGION	SMR	FREQS	GRANTED	PENDING	AVAILABLE
227800	083	Clarksville, TN-Hopkinsville, KY		200	200	0	0	
227000	052	Bowling Green-Glasgow, KY		200	110	0	90	
226200	466	Wausau-Rhineland, WI		200	168	0	32	
226000	405	San Luis Obispo, CA		200	180	0	20	
225900	482	Yakima, WA		200	200	0	0	
225700	176	Greenville-Washington, NC		200	179	0	21	
225500	278	Mansfield, OH	C7	190	157	2	31	
224600	071	Champaign-Urbana, IL		200	190	0	10	
224500	047	Bloomington-Bedford, IN		200	193	0	7	
224500	012	Altoona, PA		200	151	5	44	
222200	251	Lewiston-Auburn, ME	C7	190	122	1	67	
221000	079	Chico-Oroville, CA		200	179	0	21	
220800	288	Medford-Grants Pass, OR		200	200	0	0	
220600	165	Goldsboro-Kinston, NC		200	179	0	21	
220100	046	Bloomington, IL		200	200	0	0	
219400	339	Paducah-Murray-Mayfield, KY		200	135	0	65	
218500	216	Janesville-Beloit, WI		200	197	0	3	
218200	220	Joplin, MO-Miami, OK		200	62	0	138	
217200	471	Wheeling, WV		200	191	3	6	
216100	115	Dothan-Enterprise, AL		200	186	3	11	
213800	166	Grand Forks, ND	C7	190	190	0	0	
213200	446	Traverse City, MI		200	107	0	93	
213000	422	Sioux Falls, SD		200	133	0	67	
212700	326	Ocala, FL		200	198	0	2	
212400	175	Greenville-Greenwood, MS		200	194	0	6	
211900	201	Hyannis, MA		200	182	0	18	
211600	310	Muskegon, MI		200	165	0	35	
211000	327	Odessa, TX		200	185	15	0	
210600	067	Carbondale-Marion, IL		200	120	0	80	
210400	244	Las Cruces, NM	MX	95	0	0	95	
208000	291	Merced, CA		200	173	0	27	
206400	432	Stevens Point-Marshfield-Wisconsin Rapids, WI		200	172	0	28	
206100	473	Wichita Falls, TX		200	200	0	0	
205600	055	Bremerton, WA	C5	95	92	0	3	
204300	149	Fort Collins-Loveland, CO		200	189	11	0	
203300	382	Rocky Mount-Nelson, NC		200	192	0	8	
202900	202	Idaho Falls, ID		200	200	0	0	
201200	292	Meridian, MS		200	127	0	73	
200800	331	Olympia-Centralia, WA	C5	95	93	0	2	
198100	075	Charlottesville, VA		200	200	0	0	
197100	168	Grand Junction, CO		200	30	149	21	
196800	209	Jackson, MI	C7	190	166	1	23	
194200	090	Columbia, MO		200	128	0	72	
191000	082	Clarksburg-Elkins, WV		200	139	0	61	
190200	393	St. Joseph, MO		200	174	3	23	
190000	369	Rapid City, SD		200	200	0	0	
188400	437	Sunbury-Shamokin, PA		200	168	4	28	
185600	233	Kokomo-Logansport, IN		200	197	0	3	
185400	215	Jamestown, NY-Warren, PA-Dunkirk, NY	C2	60	40	7	13	
185100	123	Eau Claire, WI		200	175	0	25	

POPULATION	BTA#	CITY NAME	REGION	SMR FREQS	GRANTED	PENDING	AVAILABLE
184900	474	Williamson, WV-Pikeville, KY		200	82	0	118
182500	154	Fort Walton Beach, FL		200	195	0	5
182300	066	Cape Girardeau-Sikeston, MO		200	157	0	43
182100	407	Santa Fe, NM		200	180	0	20
181700	309	Muncie, IN		200	191	0	9
180700	487	Zanesville-Cambridge, OH		200	200	0	0
180700	342	Parkersburg, WV-Marietta, OH		200	183	0	17
180700	248	Lawton-Duncan, OK		200	122	0	78
180500	160	Gainesville, GA		200	199	0	1
179500	015	Anderson, IN		200	195	0	5
179100	048	Bluefield, WV		200	160	0	40
178600	340	Panama City, FL		200	200	0	0
176800	118	Dubuque, IA		200	161	0	39
176600	367	Quincy, IL-Hannibal, MO		200	95	0	105
176400	158	Gadsden, AL		200	200	0	0
175900	146	Florence, AL		200	176	0	24
175300	468	Wenatchee, WA		200	94	34	72
172400	249	Lebanon-Claremont, NH	C9	200	128	12	60
170300	022	Athens, GA		200	185	0	15
169300	313	Naples, FL		200	186	1	13
168100	465	Waterville-Augusta, ME		190	99	1	90
168000	398	Salisbury, MD		200	195	5	0
167700	094	Columbus-Starkville, MS		200	157	0	43
167200	139	Farmington, NM-Durango, CO		200	144	0	56
166400	171	Great Falls, MT		200	200	0	0
166000	035	Beckley, WV		200	72	0	128
164600	186	Hattiesburg, MS		200	116	0	84
164300	017	Anniston, AL		200	195	0	5
164100	475	Williamsport, PA		200	81	0	119
163900	242	Laredo, TX	MK	95	0	0	95
163600	104	Danville, VA		200	169	0	31
162100	039	Benton Harbor, MI		200	177	0	23
162000	219	Jonesboro-Paragould, AR		200	177	0	23
161700	316	New Bern, NC		200	161	0	39
158500	100	Cumberland, MD		200	160	6	34
158100	338	Owensboro, KY		200	189	0	11
158000	228	Kennewick-Pasco-Richland, WA		200	200	0	0
157200	312	Myrtle Beach, SC		200	134	0	66
157000	400	San Angelo, TX		200	124	0	76
155400	460	Walla Walla, WA-Pendleton, OR		200	53	0	147
154700	266	Lynchburg, VA		200	174	12	14
154700	059	Bryan-College Station, TX		200	173	0	27
154600	418	Sherman-Denison, TX		200	189	0	11
153400	348	Pine Bluff, AR		200	119	0	81
153200	134	Eureka, CA		200	20	0	180
153100	311	Muskogee, OK		200	170	13	17
153000	436	Sumter, SC		200	200	0	0
152400	214	Jacksonville, NC		200	165	0	35
				200	200	0	0

EXHIBIT B

**800 MHZ SMR
SPECTRUM AVAILABILITY REPORT
(70 - MILE SEARCH)**

PREPARED BY

**INDUSTRIAL TELECOMMUNICATIONS ASSOCIATION
AMERICAN MOBILE TELECOMMUNICATIONS ASSOCIATION**

OCTOBER 11, 1994

POPULATION	BTA#	CITY NAME	REGION	SMR	FREQS	GRANTED	PENDING	AVAILABLE
18232000	321	New York, NY		200	200	0	0	
15415600	262	Los Angeles, CA		200	200	0	0	
8376000	078	Chicago, IL		200	200	0	0	
6700100	404	San Francisco-Oakland-San Jose, CA		200	200	0	0	
6001600	346	Philadelphia, PA-Wilmington, DE-Trenton, NJ		200	200	0	0	
4754100	112	Detroit, MI	C3	140	140	0	0	
4609300	101	Dallas-Fort Worth, TX		200	200	0	0	
4298500	461	Washington, DC		200	200	0	0	
4241400	196	Houston, TX		200	200	0	0	
4140500	051	Boston, MA		200	200	0	0	
3449200	024	Atlanta, GA		200	200	0	0	
3399700	293	Miami-Fort Lauderdale, FL		200	200	0	0	
2968900	298	Minneapolis-St. Paul, MN		200	200	0	0	
2927200	084	Cleveland-Akron, OH	C3	140	140	0	0	
2852900	413	Seattle-Tacoma, WA	C5	95	95	0	0	
2792900	394	St. Louis, MO		200	200	0	0	
2651400	402	San Diego, CA	MX	95	95	0	0	
2564500	347	Phoenix, AZ		200	200	0	0	
2494600	350	Pittsburgh, PA		200	200	0	0	
2492100	029	Baltimore, MD		200	200	0	0	
2355500	440	Tampa-St. Petersburg-Clearwater, FL		200	200	0	0	
2189500	110	Denver, CO		200	200	0	0	
2043500	081	Cincinnati, OH		200	200	0	0	
1899300	226	Kansas City, MO		200	200	0	0	
1803300	389	Sacramento, CA		200	195	0	5	
1786500	358	Portland, OR		200	200	0	0	
1784000	297	Milwaukee, WI		200	200	0	0	
1746200	074	Charlotte-Gastonia, NC		200	200	0	0	
1709600	324	Norfolk-Virginia Beach-Newport News-Hampton, VA		200	200	0	0	
1618000	401	San Antonio, TX		200	200	0	0	
1537700	095	Columbus, OH		200	197	0	3	
1522900	364	Providence-Pawtucket, RI-New Bedford-Fall Riv., MA		200	200	0	0	
1489300	314	Nashville, TN		200	200	0	0	
1426900	290	Memphis, TN		200	200	0	0	
1389700	320	New Orleans, LA		200	200	0	0	
1384400	263	Louisville, KY		200	200	0	0	
1373700	399	Salt Lake City-Ogden, UT		200	200	0	0	
1369800	204	Indianapolis, IN		200	200	0	0	
1365100	336	Orlando, FL		200	200	0	0	
1325100	329	Oklahoma City, OK		200	200	0	0	
1276600	174	Greensboro-Winston-Salem-High Point, NC		200	200	0	0	
1233600	106	Dayton-Springfield, OH		200	200	0	0	
1229000	060	Buffalo-Niagara Falls, NY	C2	60	60	0	0	
1227600	044	Birmingham, AL		200	200	0	0	
1185000	212	Jacksonville, FL		200	200	0	0	
1155300	368	Raleigh-Durham, NC		200	200	0	0	
1125900	374	Richmond-Petersburg, VA		200	200	0	0	
1123300	184	Hartford, CT		200	200	0	0	
1046300	007	Albany-Schenectady, NY		200	200	0	0	
987700	245	Las Vegas, NV		200	200	0	0	

POPULATION	BTA#	CITY NAME	REGION	SMR FREQS	GRANTED	PENDING	AVAILABLE
979700	469	West Palm Beach-Boca Raton, FL		200	200	0	0
979200	318	New Haven-Waterbury-Meriden, CT		200	200	0	0
971800	232	Knoxville, TN		200	200	0	0
964400	027	Austin, TX		200	200	0	0
955100	169	Grand Rapids, MI		200	200	0	0
925600	332	Omaha, NE		200	200	0	0
875500	257	Little Rock, AR		200	200	0	0
868800	192	Honolulu, HI		200	185	0	15
863000	448	Tulsa, OK		200	185	0	15
843200	252	Lexington, KY		200	200	0	0
832500	157	Fresno, CA		200	195	0	5
811700	177	Greenville-Spartanburg, SC		200	200	0	0
797400	438	Syracuse, NY	C2	60	59	0	1
793700	444	Toledo, OH	C3	140	140	0	0
747500	111	Des Moines, IA		200	200	0	0
734500	008	Albuquerque, NM		200	200	0	0
720200	480	Worcester-Fitchburg-Leominster, MA		200	200	0	0
707100	010	Allentown-Bethlehem-Easton, PA		200	200	0	0
706300	447	Tucson, AZ	MX	95	95	0	0
691700	128	El Paso, TX	MX	95	95	0	0
682000	412	Scranton--Wilkes-Barre--Hazleton, PA		200	200	0	0
677300	427	Springfield-Holyoke, MA		200	200	0	0
671000	181	Harrisburg, PA		200	200	0	0
664800	155	Port Wayne, IN		200	200	0	0
657000	229	Kingsport, TN-Johnson City, TN-Bristol, VA-TN		200	195	0	5
653900	072	Charleston, SC		200	200	0	0
653500	410	Savannah, GA		200	195	0	5
641800	425	Spokane, WA		200	200	0	0
640000	032	Baton Rouge, LA		200	200	0	0
626800	210	Jackson, MS		200	185	0	15
622400	390	Saginaw-Bay City, MI	C7	190	168	1	21
615400	376	Roanoke, VA		200	200	0	0
614700	472	Wichita, KS		200	200	0	0
611200	302	Mobile, AL		200	200	0	0
611100	272	Madison, WI		200	200	0	0
605600	028	Bakersfield, CA		200	196	0	4
603600	271	Macon-Warner Robins, GA		200	200	0	0
589300	141	Fayetteville-Lumberton, NC		200	200	0	0
586900	419	Shreveport, LA		200	192	0	8
585300	091	Columbia, SC		200	200	0	0
568000	274	Manchester-Nashua-Concord, NH		200	200	0	0
554600	428	Springfield, MO		200	171	0	29
548400	434	Stockton, CA		200	200	0	0
542100	408	Sarasota-Bradenton, FL		200	199	0	1
537000	026	Augusta, GA		200	200	0	0
524300	151	Fort Myers, FL		200	199	0	1
523800	020	Asheville-Hendersonville, NC		200	200	0	0
521600	076	Chattanooga, TN		200	200	0	0
520700	065	Canton-New Philadelphia, OH	C7	190	186	2	2
509100	099	Corpus Christi, TX		200	200	0	0

POPULATION	BTA#	CITY NAME	REGION	SFR	FREQS	GRANTED	PENDING	AVAILABLE
508300	135	Evansville, IN		200	200	0	0	
504700	236	Lafayette-New Iberia, LA		200	200	0	0	
499900	145	Flint, MI	C3	140	134	0	1	
499400	241	Lansing, MI	C7	190	174	0	16	
492700	484	Youngstown-Warren, OH	C7	190	190	0	0	
484000	073	Charleston, WV		200	200	0	0	
478100	357	Portland-Brunswick, ME		200	200	0	0	
468900	372	Reno, NV		200	200	0	0	
463600	198	Huntsville, AL		200	200	0	0	
462500	268	McAllen, TX	MX	95	0	0	95	
461700	395	Salem-Albany-Corvallis, OR		200	200	0	0	
459300	303	Modesto, CA		200	196	0	4	
456200	344	Peoria, IL		200	200	0	0	
452500	305	Montgomery, AL		200	200	0	0	
447200	089	Colorado Springs, CO		200	190	10	0	
446500	458	Visalia-Porterville-Hanford, CA		200	195	0	5	
443500	050	Boise-Nampa, ID		200	200	0	0	
442900	240	Lancaster, PA		200	156	3	41	
436800	439	Tallahassee, FL		200	200	0	0	
434200	034	Beaumont-Port Arthur, TX		200	200	0	0	
433400	361	Poughkeepsie-Kingston, NY		200	200	0	0	
433100	483	York-Hanover, PA		200	200	0	0	
430700	289	Melbourne-Titusville, FL		200	200	0	0	
429000	107	Daytona Beach, FL		200	200	0	0	
424800	239	Lakeland-Winter Haven, FL		200	200	0	0	
423700	014	Anchorage, AK		200	200	0	0	
421200	380	Rockford, IL		200	200	0	0	
420700	105	Davenport, IA-Moline, IL		200	192	0	8	
412500	018	Appleton-Oshkosh, WI		200	200	0	0	
399000	119	Duluth, MN	C9	200	188	0	12	
395100	264	Lubbock, TX		200	198	0	2	
384300	406	Santa Barbara-Santa Maria, CA		200	200	0	0	
380300	013	Amarillo, TX		200	200	0	0	
379300	063	Burlington, VT	C2	60	45	3	12	
372600	397	Salinas-Monterey, CA		200	195	0	5	
370200	152	Fort Pierce-Vero Beach-Stuart, FL		200	200	0	0	
366900	197	Huntington, WV-Ashland, KY		200	120	0	80	
360300	343	Pensacola, FL		200	200	0	0	
359400	319	New London-Norwich, CT		200	200	0	0	
359200	223	Kalamazoo, MI		200	200	0	0	
358500	043	Binghamton, NY		200	151	0	49	
352000	092	Columbus, GA		200	198	0	2	
349500	042	Biloxi-Gulfport-Pascagoula, MS		200	200	0	0	
346400	370	Reading, PA		200	200	0	0	
337900	179	Hagerstown, MD-Chambersburg, PA-Martinsburg, WV		200	200	0	0	
337800	424	South Bend-Mishawaka, IN		200	197	0	3	
331800	421	Sioux City, IA		200	177	0	23	
328600	025	Atlantic City, NJ		200	200	0	0	
325100	304	Monroe, LA		200	138	0	62	
324500	006	Albany-Tifton, GA		200	189	0	11	

POPULATION	BT#	CITY NAME	REGION	SMR	FREQS	GRANTED	PENDING	AVAILABLE
319600	173	Green Bay, WI		200	181	0	19	
318600	030	Bangor, ME	C7	190	80	2	108	
317300	256	Lincoln, NE		200	195	0	5	
316600	127	Elmira-Corning-Hornell, NY		200	101	7	92	
315600	453	Utica-Rome, NY	C9	200	152	0	48	
312500	016	Anderson, SC		200	200	0	0	
306400	463	Watertown, NY	C2	60	30	0	30	
301000	234	La Crosse, WI-Winona, MN		200	198	0	2	
300000	138	Fargo, ND		200	181	0	19	
299900	189	Hickory-Lenoir-Morganton, NC		200	200	0	0	
297600	260	Longview-Marshall, TX		200	195	0	5	
297000	449	Tupelo-Corinth, MS		200	199	0	1	
294000	441	Temple-Killeen, TX		200	198	0	2	
293300	153	Fort Smith, AR		200	133	0	67	
292700	041	Billings, MT		200	200	0	0	
292400	133	Eugene-Springfield, OR		200	196	0	4	
289400	056	Brownsville-Marligen, TX		200	57	0	143	
287000	009	Alexandria, LA		200	200	0	0	
284700	365	Provo-Orem, UT		200	200	0	0	
277800	452	Tyler, TX		200	200	0	0	
277300	131	Erie, PA	C2	60	59	0	1	
274900	459	Waco, TX		200	200	0	0	
273400	371	Redding, CA		200	39	0	161	
272600	159	Gainesville, FL		200	200	0	0	
271700	366	Pueblo, CO		200	200	0	0	
267000	070	Cedar Rapids, IA		200	196	0	4	
265800	238	Lake Charles, LA		200	200	0	0	
265500	195	Houma-Thibodaux, LA		200	199	0	1	
263300	116	Dover, DE		200	200	0	0	
263000	478	Wilmington, NC		200	200	0	0	
259800	462	Waterloo-Cedar Falls, IA		200	195	0	5	
259200	426	Springfield, IL		200	199	0	1	
258600	443	Texarkana, TX-AR		200	164	0	36	
258200	211	Jackson, TN		200	197	0	3	
253800	235	Lafayette, IN		200	197	0	3	
253600	255	Lima, OH	C9	200	196	1	3	
252600	391	St. Cloud, MN		200	200	0	0	
249500	445	Topeka, KS		200	195	5	0	
249000	003	Abilene, TX		200	200	0	0	
247200	109	Decatur-Effingham, IL		200	200	0	0	
245100	147	Florence, SC		200	200	0	0	
244200	450	Tuscaloosa, AL		200	200	0	0	
243800	277	Mankato-Fairmont, MN		200	200	0	0	
241500	126	Elkhart, IN		200	197	0	3	
239100	330	Olean, NY-Bradford, PA	C2	60	59	0	1	
238600	218	Johnstown, PA		200	199	0	1	
237900	140	Fayetteville-Springdale-Rogers, AR		200	143	0	57	
237300	442	Terre Haute, IN		200	199	0	1	
237100	378	Rochester-Austin-Albert Lea, MN		200	198	0	2	
232200	033	Battle Creek, MI		200	200	0	0	

POPULATION	BTA#	CITY NAME	REGION	SMR FREQS	GRANTED	PENDING	AVAILABLE
227800	083	Clarksville, TN-Hopkinsville, KY		200	200	0	0
227000	052	Bowling Green-Glasgow, KY		200	200	0	0
226200	466	Wausau-Rhineland, WI		200	181	0	19
226000	405	San Luis Obispo, CA		200	200	0	0
225900	482	Yakima, WA		200	200	0	0
225700	176	Greenville-Washington, NC		200	195	0	5
225500	278	Mansfield, OH	C7	190	189	0	1
224600	071	Champaign-Urbana, IL		200	199	0	1
224500	047	Bloomington-Bedford, IN		200	199	0	1
224500	012	Altoona, PA		200	175	18	7
222200	251	Lewiston-Auburn, ME	C7	190	132	2	56
221000	079	Chico-Oroville, CA		200	190	0	10
220800	288	Medford-Grants Pass, OR		200	200	0	0
220600	165	Goldsboro-Kinston, NC		200	195	0	5
220100	046	Bloomington, IL		200	200	0	0
219400	339	Paducah-Murray-Mayfield, KY		200	190	0	10
218500	216	Janesville-Beloit, WI		200	200	0	0
218200	220	Joplin, MO-Miami, OK		200	140	0	60
217200	471	Wheeling, WV		200	200	0	0
216100	115	Dothan-Enterprise, AL		200	199	0	1
213800	166	Grand Forks, ND	C7	190	190	0	0
213200	446	Traverse City, MI		200	107	0	93
213000	422	Sioux Falls, SD		200	158	0	42
212700	326	Ocala, FL		200	200	0	0
212400	175	Greenville-Greenwood, MS		200	199	0	1
211900	201	Hyannis, MA		200	200	0	0
211600	310	Muskegon, MI		200	183	0	17
211000	327	Odessa, TX		200	190	10	0
210600	067	Carbondale-Marion, IL		200	175	0	25
210400	244	Las Cruces, NM	MX	95	0	0	95
208000	291	Merced, CA		200	200	0	0
206400	432	Stevens Point-Marshfield-Wisconsin Rapids, WI		200	196	0	4
206100	473	Wichita Falls, TX		200	200	0	0
205600	055	Bremerton, WA	CS	95	93	0	2
204300	149	Ft. Collins-Loveland, CO		200	194	6	0
203300	382	Rocky Mount-Wilson, NC		200	200	0	0
202900	202	Idaho Falls, ID		200	200	0	0
201200	292	Meridian, MS		200	188	0	12
200800	331	Olympia-Centralia, WA	CS	95	93	0	2
198100	075	Charlottesville, VA		200	200	0	0
197100	168	Grand Junction, CO		200	40	144	16
196800	209	Jackson, MI	C7	190	179	0	11
194200	090	Columbia, MO		200	143	0	57
191000	082	Clarksburg-Elkins, WV		200	194	2	4
190200	393	St. Joseph, MO		200	200	0	0
190000	369	Rapid City, SD		200	200	0	0
188400	437	Sunbury-Shamokin, PA		200	193	0	7
185600	233	Kokomo-Logansport, IN		200	200	0	0
185400	215	Jamestown, NY-Warren, PA-Dunkirk, NY	C2	60	59	0	1
185100	123	Eau Claire, WI		200	200	0	0

POPULATION	BTA#	CITY NAME	REGION	SMR	FREQS	GRANTED	PENDING	AVAILABLE
184900	474	Williamson, WV-Pikeville, KY		200	181	0	19	
182500	154	Fort Walton Beach, FL		200	200	0	0	
182300	066	Cape Girardeau-Sikeston, MO		200	162	0	38	
182100	407	Santa Fe, NM		200	200	0	0	
181700	309	Muncie, IN		200	199	0	1	
180700	487	Zanesville-Cambridge, OH		200	200	0	0	
180700	342	Parkersburg, WV-Marietta, OH		200	195	0	5	
180700	248	Lawton-Duncan, OK		200	168	0	32	
180500	160	Gainesville, GA		200	200	0	0	
179500	015	Anderson, IN		200	199	0	1	
179100	048	Bluefield, WV		200	199	0	1	
178600	340	Panama City, FL		200	200	0	0	
176800	118	Dubuque, IA		200	195	0	5	
176600	367	Quincy, IL-Hannibal, MO		200	142	0	58	
176400	158	Gadsden, AL		200	200	0	0	
175900	146	Florence, AL		200	200	0	0	
175300	468	Wenatchee, WA		200	140	14	46	
172400	249	Lebanon-Claremont, NH	C9	200	194	0	6	
170300	022	Athens, GA		200	200	0	0	
169300	313	Naples, FL		200	199	0	1	
168100	465	Waterville-Augusta, ME	C7	190	123	2	65	
168000	398	Salisbury, MD		200	200	0	0	
167700	094	Columbus-Starkville, MS		200	194	0	6	
167200	139	Farmington, NM-Durango, CO		200	154	0	46	
166400	171	Great Falls, MT		200	200	0	0	
166000	035	Beckley, WV		200	122	0	78	
164600	186	Hattiesburg, MS		200	188	1	11	
164300	017	Anniston, AL		200	200	0	0	
164100	475	Williamsport, PA		200	159	5	36	
163900	242	Laredo, TX	MX	95	0	0	95	
163600	104	Danville, VA		200	200	0	0	
162100	039	Benton Harbor, MI		200	200	0	0	
162000	219	Jonesboro-Paragould, AR		200	200	0	0	
161700	316	New Bern, NC		200	182	0	18	
158500	100	Cumberland, MD		200	192	5	3	
158100	338	Owensboro, KY		200	194	0	6	
158000	228	Kennewick-Pasco-Richland, WA		200	200	0	0	
157200	312	Myrtle Beach, SC		200	200	0	0	
157000	400	San Angelo, TX		200	183	17	0	
155400	460	Walla Walla, WA-Pendleton, OR		200	114	0	86	
154700	266	Lynchburg, VA		200	200	0	0	
154700	059	Bryan-College Station, TX		200	200	0	0	
154600	418	Sherman-Denison, TX		200	199	0	1	
153400	348	Pine Bluff, AR		200	173	0	27	
153200	134	Eureka, CA		200	25	0	175	
153100	311	Muskogee, OK		200	195	5	0	
153000	436	Sumter, SC		200	200	0	0	
152400	214	Jacksonville, NC		200	189	0	11	
				200	200	0	0	

EXHIBIT C

SMR CHANNEL USAGE - ALABAMA

FREQUENCY	TOTAL	LICENSED	PENDING
861.0125	10	1 - Centennial Telecommunications, Inc. 1 - John H. Minehan <u>6</u> - The Nextel Group 8 - TOTAL	1 - USITV, Inc. <u>1</u> - ZZZ Communications, Inc. 2 - TOTAL
861.0375	7	1 - National Repeater Systems, Inc. 1 - Mike E. Dykes 3 - Southern Company <u>2</u> - The Nextel Group 7 - TOTAL	
861.0625	22	2 - Sunrise Communications, Inc. <u>19</u> - The Nextel Group 21 - TOTAL	1 - ZZZ Communications, Inc.
861.0875	25	1 - Palmer Communications, Inc. 1 - Centennial Telecommunications, Inc. <u>21</u> - The Nextel Group 23 - TOTAL	1 - OOH Baby Productions, Inc. <u>1</u> - Gulf States Communications, Inc. 2 - TOTAL
861.1125	16	1 - Atlantic Cellular Company LP 1 - Palmer Communications, Inc. 1 - Robert Skelton <u>12</u> - The Nextel Group 15 - TOTAL	1 - Harrowby TV, Inc.

SMR CHANNEL USAGE - ALABAMA (Cont'd)

FREQUENCY	TOTAL	LICENSED	PENDING
861.1375	18	1 - Sunrise Communications, Inc. 1 - Huntsville Radio Service, Inc, 1 - Palmer Communications, Inc. <u>13</u> - The Nextel Group 16 - TOTAL	1 - Bill Roberts, Inc. <u>1</u> - Southwest Mobilte Services, Inc. 2 - TOTAL
861.1625	15	1 - Shoals Communications & Electronics 1 - Jerry McKean * 1 - Elizabeth Walker 1 - Centennial Telecommunications, Inc. 1 - Marie Rose * 1 - Comm Serv, Inc. 1 - Billy Hinds; Kenneth K. Campbell <u>4</u> - The Nextel Group * 11 - TOTAL	1 - USITV, Inc. 1 - Jerry McKean * 1 - Marie Rose * <u>1</u> - The Nextel Group * 4 - TOTAL
861.1875	6	1 - Atlantic Cellular Company LP 1 - Centennial Telecommunications, Inc. 1 - Thomas A. Sharp, Jr. 1 - Nancy Finley <u>2</u> - The Nextel Group 6 - TOTAL	
861.2125	15	1 - Central Communications 1 - Palmer Communications, Inc. <u>10</u> - The Nextel Group 12 - TOTAL	1 - Harrowby TV, Inc. 1 - Henry R. Currin, Jr. <u>1</u> - Elizabeth Martone, Inc. 3 - TOTAL